

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

2013 SEP -4 PM 4:33

Bobbie Shaw-Hunter

(Name of plaintiff or plaintiffs)

v.

CIVIL ACTION NO. _____

Lemoyne-Awon College

(Name of defendant or defendants)

COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. §2000e-5. Equitable and other relief are also sought under 42 U.S.C. §2000e-5(g).

2. Plaintiff, Bobbie Shaw-Hunter
(name of plaintiff)

is a citizen of the United States and resides at 7500 ... P.O. Box 1522
(street address)

Olive Branch, MS
(city) (country) (state)
38654 (901) 573-4374
(zip code) (telephone number)

3. Defendant Bobbie Shaw-Hunter

(defendant's name)
lives at, or its business is located at 13700 Lauren Lane P.O. Box 1522
Olive Branch, MS
(street address)

4. Plaintiff sought employment from the defendant or was employed by the defendant at
807 Walker Street
Memphis USA TN 38126
(city) (country) (state) (zip code)

5. Defendant discriminated against plaintiff in the manner indicated in paragraph 9 of this complaint on or about 22 September 2011
(day) (month) (year)

6. Defendant filed charges against the defendant with the Tennessee Fair Employment Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about 22 September 2011
(day) (month) (year)

7. Plaintiff filed charges against the defendant with the Equal Employment Opportunity Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about 22 September 2011
(day) (month) (year)

8. The Equal Employment Opportunity Commission issued a Notice of Right to Sue, which was received by plaintiff on 5 June 2013. (Attach a copy of the notice to this complaint.)
(day) (month) (year)

9. Because of plaintiff's (1) X race, (2) X color, (3) ___ sex, (4) ___ religion, (5) ___ national origin, defendant

(a) ___ failed to employ plaintiff.

(b) X terminated plaintiff's employment.

(c) ___ failed to promote plaintiff.

(d) Retaliation for filing previous

Racial Discrimination Complaint (Jan 2007).
The proposed discrimination was rescinded
however, retaliation, and harassment continued
until I was terminated.

10. The circumstances under which defendant discriminated against plaintiff were as follows:

I was hired as an Assistant Professor August 2005. In December 2006 I was informed by my supervisor that Dr. Barbara Frankle wanted me terminated. My supervisor gave me an outstanding rating and assured me that it was Dr. Frankle, her white supervisor who wanted me terminated.

I filed an discrimination complaint with the president of the college. The Attorney for the college sent me a letter recinding that decision. Once that decision was recinded, the environment became hostile, discriminatory and I was subjected to many acts of retaliation until I was terminated. The tenure process became a way to finally terminate me.

11. The acts set forth in paragraph 9 of this complaint

- (a) ___ are still being committed by defendant.
- (b) ___ are no longer being committed by defendant.
- (c) ☒ may still be being committed by defendant.

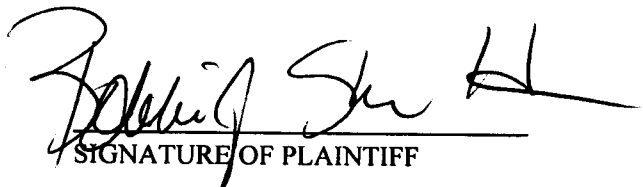
12. Please attach to this complaint a copy of the charges filed with the Equal Employment Opportunity Commission, which are submitted as a brief statement of the facts supporting this complaint.

WHEREFORE, Plaintiff prays that the Court grant the following relief to the plaintiff:

- (a) ___ Defendant be directed to employ plaintiff, or
- (b) ☒ Defendant be directed to re-employ plaintiff, or
- (c) ___ Defendant be directed to promote plaintiff, or;
- (d) ☒ Defendant be directed to pay restitution of
back pay & benefits

and that the Court grant such other relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.

13. I would like to have my case tried by a jury. Yes ☒ No ()


SIGNATURE OF PLAINTIFF